

CASE NO. 17-71353

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IN THE UNITED STATES COURT OF APPEALS

FOR THE NINTH CIRCUIT

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NATIONAL LABOR RELATIONS BOARD,

*Petitioner,*

v.

CAESARS ENTERTAINMENT D/B/A RIO ALL-SUITES  
HOTEL AND CASINO,

*Respondent,*

and

INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES,  
DISTRICT COUNCIL 15, LOCAL 159, AFL-CIO,

*Intervenor.*

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ON APPEAL FROM NATIONAL LABOR RELATIONS BOARD  
CASE NO. 362 NLRB NO. 190

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**MOTION FOR SUMMARY ENFORCEMENT**

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ALLIED TRADES, DISTRICT COUNCIL 15, LOCAL 159, AFL-CIO

This Court set a briefing schedule requiring that the opening brief of the employer being submitted on August 30, 2017. Rather than file a brief, the employer filed a motion to dismiss. This Court has not entered any further order staying the briefing schedule. Because employer has now defaulted on its brief, the Court should summarily enforce the Board's Order.

Dated: October 4, 2017

Respectfully Submitted,

By: /s/ David A. Rosenfeld  
David A. Rosenfeld  
Caren P. Sencer  
WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

Proposed Intervenor, INTERNATIONAL  
UNION OF PAINTERS AND ALLIED  
TRADES, DISTRICT COUNCIL 15,  
LOCAL 159, AFL-CIO

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**CERTIFICATE OF SERVICE**

I am a citizen of the United States and an employee in the County of Alameda, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 1001 Marina Village Parkway, Suite 200, Alameda, California 94501.

I hereby certify that on October 4, 2017, I electronically filed the foregoing **MOTION FOR SUMMARY ENFORCEMENT** with the United States Court of Appeals, Ninth Circuit, by using the Court's CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the Notice of Electronic Filing by the Court's CM/ECF system.

I certify under penalty of perjury that the above is true and correct.  
Executed at Alameda, California, on October 4, 2017.

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*/s/ Karen Kempler*  
Karen Kempler